

REMARKS

This is intended as a full and complete second response to the Final Office Action dated January 16, 2004, having a shortened statutory period for response set to expire on April 16, 2004. Please reconsider the claims pending in the application for reasons discussed below.

Claims 5-11 and 21-29 are pending in the application. Claims 5-11 and 21-29 remain pending following entry of this response. Claims 5, 6, 11 and 21 have been amended. Applicants submit that the amendments do not introduce new matter, as was confirmed by the Examiner's Advisory Action mailed on March 4, 2004.

Applicants hereby incorporate by reference their previous response mailed on February 24, 2004. Applicants supplement their previous response with the following additional observations made after further review of *Gerace*.

The present claims are directed to the manner in which electronic documents are rendered on a networked client display device. The claims provide for retrieving electronic documents through a network connection, wherein the electronic documents include fields with which a user previously interacted. The fields are then repositioned from an unviewable area of the client display device to a viewable area. Thus, the claims positively recite retrieving a static object, i.e., an electronic document, and then performing some repositioning processing during a rendering phase on the client display device. In the server centric environment of *Gerace*, this kind of processing is an impossibility. *Gerace* is directed to a computer network method and apparatus providing targeting of appropriate audience based on psychographic or behavioral profiles of end-users. (See, Abstract.) The psychographic profile of *Gerace* is generated for a Home Page residing on a server 27. (See, Summary of the Invention and Figures 1 and 2.) On the basis of the psychographic profile (and other inputs described below), the Home Page may be customized to a specific user. In other words, the Home Page is a dynamically generated web page. The dynamically generated web page is generated and maintained on a web server 27. (See, Figure 2.) As such, the Home Page is created on the server 27 before being returned to a requesting device, and no further special processing is performed by the requesting device. There is no teaching or suggestion in *Gerace* to first retrieve, by a client device,

the Home Page from a network location and then manipulate the Home Page on the client device. In fact, such processing would render the invention of *Gerace* inoperable or unsatisfactory for its intended purpose, or would change the principle of operation of *Gerace*, wherefore the Examiner's suggestion to combine is impermissible. See, MPEP 2143.01. Applicants submit that this conclusion is inescapable on the basis of, for example, Figure 2 of *Gerace*. Figure 2 shows that the program 31 of Figure 2 *Gerace* requires as input Agate Data Assembly 71, User Profile Member 73 and Ad Module 75. Accordingly, the Examiner's suggestion that the User Profile 73 may be moved to the client side renders *Gerace* inoperable or unsatisfactory for its intended purpose, or would change the principle of operation because the program 31 which takes the user profile as input resides on the server 27. Further, a suggestion that the program 31 may also be moved to the client side is not feasible because the program 31 also requires as input the Agate Data Assembly 71 and the Ad Module 75. Accordingly, an obviousness rejection would require moving the program 31, the Agate Data Assembly 71, the User Profile Member 73 and the Ad Module 75 to the client side. The Examiner's rejection does not, and cannot, support such suggestion. In addition to being a substantial departure from what *Gerace* discloses, such a suggestion renders *Gerace* inoperable because the Ad Module 75, for example, is an object that is maintained by, and accessible to, advertising sponsors. The Ad Module 75, which corresponds to the Sponsor Objects 33 in object oriented environment, is described between column 11, line 56 through column 13 line 33. One of the functions of the sponsor objects 33 is to "enable[s] sponsors of the advertisements to obtain reports on successful use of the advertisements." (Column 12, lines 59-60.) Moving the Ad Module 75/Sponsor Objects 33 to the client side renders this function inoperable.

Accordingly, on the basis of *Gerace* alone, Applicants submit that the rejection should be withdrawn and the claims be allowed. For these reasons, withdrawal of the rejection is respectfully requested.

Having addressed all issues set out in the office action, Applicant respectfully submits that the claims are in condition for allowance and respectfully request that the claims be allowed.

Respectfully submitted,



Gero G. McClellan
Registration No. 44,227
MOSER, PATTERSON & SHERIDAN, L.L.P.
3040 Post Oak Blvd. Suite 1500
Houston, TX 77056
Telephone: (713) 623-4844
Facsimile: (713) 623-4846
Attorney for Applicant(s)